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10 *Attorneys for Defendant*
11 *NETFLIX, INC.*

12 **UNITED STATES DISTRICT COURT**
13
14 **NORTHERN DISTRICT OF CALIFORNIA**
15
16 **OAKLAND DIVISION**

17 LAURI VALJAKKA,

18 *Plaintiff,*

19 v.

20 NETFLIX, INC.,

21 *Defendant.*

Case No.: 4:22-cv-01490-JST

**DECLARATION OF RACHAEL D.
LAMKIN IN SUPPORT OF DEFENDANT
NETFLIX, INC.'S RESPONSE TO LAURI
VALJAKKA'S MOTION FOR
SUMMARY JUDGMENT DISMISSING
THE CUVTA COUNTERCLAIM**

Judge: Hon. Jon S. Tigar

1 I, Rachael D. Lamkin, hereby declare:

2 1. I am a partner with the law firm Baker Botts L.L.P. (“Baker Botts”), and counsel of
3 record for Defendant Netflix, Inc. (“Netflix”) in the above-captioned matter.

4 2. I am admitted to practice in all state and federal courts in California, federal courts
5 in Colorado and the Eastern and Western Districts of Texas. I am also admitted in the Federal
6 Circuit, the International Trade Commission, the Court of International Trade, and this Honorable
7 Court.

8 3. I have personal knowledge of the facts stated herein.

9 4. Attached as Exhibit 1 is a true and correct copy of a redline comparison prepared by
10 counsel for Netflix, using Microsoft Word, between Valjakka’s opposition to Netflix’s motion for
11 a preliminary injunction under the CUVTA and his opening brief moving for summary judgment
12 on Netflix’s CUVTA claim. The substance of the briefs has been reproduced word-for-word and
13 compared for the Court’s ease of reference; no statements therein have been altered or modified.

14 5. Attached as Exhibit 2 is a true and correct copy of an email from Eric Morehouse to
15 Lauri Valjakka and Onni Hietalahhti, dated November 30, 2021.

16 I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true
17 and correct to the best of my knowledge.

18 Executed on 8th day of September 2025 in San Francisco, California.

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20 /s/ Rachael D. Lamkin
21 Rachael D. Lamkin
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